

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE:

**JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION**

This Document Relates to:

Melissa Parsons and Terry Lee Parsons,

v.

Johnson & Johnson,
Johnson & Johnson Consumer, Inc.
f/k/a Johnson & Johnson Consumer
Companies, Inc.

Civil Case No. 3:19-cv-21967-FLW

MDL No. 2738

3:16-md-02738-FLW-LHG

NOTICE TO TAKE VIDEOTAPED TRIAL PRESERVATION DEPOSITION

PLEASE TAKE NOTICE that pursuant to Rule 30 of the *Federal Rules of Civil Procedure*, the oral and videotaped deposition of Plaintiff, **MELISSA PARSONS**, will be taken before a person authorized to administer the oath. This deposition will be videotaped for use at trial and counsel are specifically informed that Plaintiff's health is declining such that she may not be available or capable to attend trial; therefore, this deposition is intended to preserve her testimony for use before the jury. The taking of said deposition may be adjourned from day to day until completed.

DATE AND TIME OF DEPOSITION: JANUARY 14, 2021, AT 10:00 A.M. EST

**LOCATION: GARY C. JOHNSON, P.S.C.
232 SECOND STREET
PIKEVILLE, KY 41502**

**COURT REPORTER: PAM OSBORNE
OSBORNE REPORTING SERVICE
P.O. BOX 1163
PIKEVILLE, KY 41502**

Respectfully submitted,

/s/Michael E. Liska

Gary C. Johnson

Michael E. Liska

Brittany Deskins Johnson

GARY C. JOHNSON, P.S.C.

110 Caroline Avenue

P. O. Box 231

Pikeville, Kentucky 41501

Telephone: (606) 437-4002

Facsimile: (606) 437-0021

gary@garycjohnson.com

mliska@garycjohnson.com

bjohnson@garycjohnson.com

Co-Counsel for Plaintiffs

-and-

Richard H. Friedman

Peter J. Mullenix

Friedman Rubin, PLLP

1109 1st Avenue

Suite 501

Seattle, Washington 98101

Telephone: (206) 501-4446

Facsimile: (206) 623-0794

RFriedman@friedmanrubin.com

PMullenix@friedmanrubin.com

Co-Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of October, 2020, a copy of the foregoing was filed via the Court's CM/ECF electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Michael E. Liska
Co-Counsel for Plaintiffs